1 Tom McAvity, 034403 **Phoenix Fresh Start Bankruptcy** 2 4602 E Thomas Rd, Ste S-9 PHOENIX, AZ 85028 3 Phone: 602-598-5075 Email: documents@phxfreshstart.com 4 5 UNITED STATES BANKRUPTCY COURT DISTRICT OF ARIZONA 6 Chapter: 13 7 In re: 8 Case No. 2:20-bk-03069-PS RAYMOND N MILYARD, 9 **OBJECTION TO TRUSTEE'S** TAMMY A. THIBOUTOT, RECOMMENDATION 10 Debtors. 11 Comes now the above-named Debtors, RAYMOND N MILYARD and TAMMY A. 12 THIBOUTOT, by and through counsel of record and hereby objects to the Chapter 13 Trustee's 13 Recommendation filed on January 5, 2023 docketed at docket no. 69. Debtors have not been able 14 to fully comply with the Trustee's Recommendations and are still working to resolve the outstanding issues in order to comply with the Trustee's evaluation. Debtors represents the 15 following in support of their motion: 16 1. Debtors are reviewing the case with counsel in regards to filing a second 17 Modified Plan. 18 19 20 21 PRAYER FOR RELIEF 22 WHEREFORE, Debtors pray that the Court grant additional time, and grant Debtors until 23 March 29, 2023 to comply with Trustee Recommendations. 24 Dated: February 27, 2023. 25

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2	Respectfully submitted:
3	/s/ Tom McAvity
4	Tom McAvity, 034403 Phoenix Fresh Start Bankruptcy
5	4602 E Thomas Rd
6	Phoenix AZ 85018 Attorney for Debtor
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13	<u>CERTIFICATE OF SERVICE</u>
14	This is to certify that the foregoing was submitted on February 27, 2023 in the United
15	States Bankruptcy Court for filing and transmittal of notice of electronic filing to the United
16	
	States Trustee, the Chapter 13 Trustee and the ECF registrants, including counsel for each of
	States Trustee, the Chapter 13 Trustee and the ECF registrants, including counsel for each of debtors' mortgage creditors, appearing in this case.
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17 18	
17 18 19	debtors' mortgage creditors, appearing in this case.
17 18 19 20	debtors' mortgage creditors, appearing in this case.
17 18 19 20 21	debtors' mortgage creditors, appearing in this case.
117 118 119 220 221 222	debtors' mortgage creditors, appearing in this case.
117 118 119 120 121 122 122 123 124	debtors' mortgage creditors, appearing in this case.
117 118 119 120 121 122 123 131	debtors' mortgage creditors, appearing in this case.
117	debtors' mortgage creditors, appearing in this case.